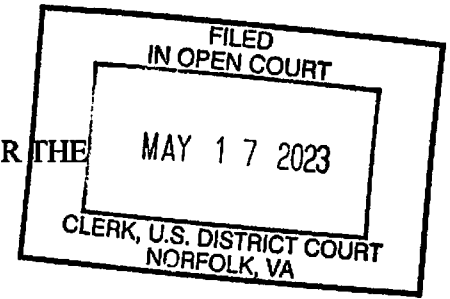


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

NORFOLK DIVISION



UNITED STATES OF AMERICA

v.

BRYANT MARCUS WILKERSON,
a/k/a "Kobe,"

Defendant.

Criminal No. 2:22-CR-152

STATEMENT OF FACTS

The United States and the defendant, BRYANT MARCUS WILKERSON, a/k/a "Kobe," agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. On November 3, 2020, at approximately 7:36pm in Chesapeake, Virginia, in the Eastern District of Virginia, the defendant approached A.B. who was sitting inside his red 2015 Kia Optima, which had been transported, shipped, and received in interstate and foreign commerce, after leaving work. Before A.B. could close the driver side door of the vehicle, the defendant stood in between the door and the driver seat and told A.B., "You're going to get out of the fucking car or I am going to shoot you." A.B. initially stayed in the vehicle. The defendant produced a firearm and pointed it at A.B.'s face. The defendant then struck A.B. in the face with the firearm. A.B. exited his vehicle, and the defendant got in the driver's seat and drove away.

2. On November 4, 2020, the Kia Optima was found unoccupied in Virginia Beach. The Virginia Beach Police Department processed the Kia Optima for fingerprints and found one latent print matching the defendant's fingerprint on the exterior of the rear driver side door. A.B. later identified the defendant in a photo lineup.

DW DB
ALC

3. On November 9, 2020, deputies from the Currituck County Police Department attempted to stop the defendant driving a Ford Explorer Sport Trac stolen from Chesapeake, Virginia. The defendant fled from police and ran on foot into a wooded area along Caratoke Highway in North Carolina.

4. After some time, the defendant ran from the wooded area back onto the roadway. As he ran, he pointed a firearm at vehicles traveling south on Caratoke Highway. The defendant eventually approached a white 2009 Chevrolet Silverado with an attached trailer, which had been transported, shipped, and received in interstate and foreign commerce, being driven by P.D. The defendant jumped on the hood of the vehicle, pointed a firearm at P.D., and told him to get out of the truck. The defendant then fired a round into the dash of the truck. The defendant jumped off the hood and ran to the driver side door. The defendant opened the door and pointed the firearm at P.D. again. P.D. got out of the truck, and the defendant got in and drove away.

5. Law enforcement officers continued to chase the defendant in the Chevrolet Silverado. The pursuit continued back into Chesapeake, Virginia where the defendant was eventually arrested. The defendant abandoned the Chevrolet Silverado and attempted to hide in a vehicle parked in a personal garage. Officers found the defendant and removed him from the back seat of the vehicle. A Glock 19 9mm handgun was located in the back seat of a vehicle from which the defendant was removed.

6. The defendant agrees that he brandished a firearm during and in relation to a crime of violence as set forth in Count 5 of the Superseding Indictment and described above in the Statement of Facts.

7. The defendant further agrees that he discharged a firearm during and in relation to a crime of violence as set forth in Count 7 of the Superseding Indictment and described above in the Statement of Facts.

8. The actions taken by the defendant in furtherance of the offenses charges in this case, carjacking, brandishing a firearm during a crime of violence, and discharging a firearm during a crime of violence, including the acts above, were done knowingly with the specific intent to violate the law.

9. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

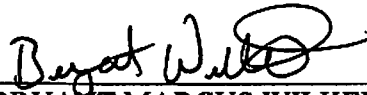
Respectfully submitted,

Jessica D. Aber
United States Attorney

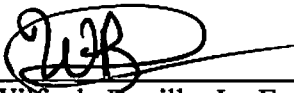
By:


Amanda L. Cheney
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, BRYANT MARCUS WILKERSON, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


BRYANT MARCUS WILKERSON

We are attorneys for the defendant, BRYANT MARCUS WILKERSON. We have carefully reviewed the above Statement of Facts with him. To our knowledge, his decision to stipulate to these facts is an informed and voluntary one.


Wilfredo Bonilla, Jr., Esq.
Keith Kimball, Esq.
Attorneys for BRYANT MARCUS WILKERSON